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12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 FLORAME DELOS REYES LU DO, an )  
15 individual, and as the Court-Appointed Personal )  
16 Representative of the Estate of CAYETANO )  
17 LU DO, a deceased individual, )

18 ) Case No. 2:14-cv-01553-GMN-VCF

19 Plaintiff, )  
20 )  
21 v. )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

**BANK OF AMERICAN, N.A.'S  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT  
(First Request)**

BANK OF AMERICA, N.A., d/b/a BANK OF )  
AMERICA CORPORATION, a Delaware )  
Corporation; WELLS FARGO BANK, N.A., a )  
California corporation; and ROE COMPANIES )  
I-X, inclusive, )

Defendants. )  
----- )

19 Defendant Bank of America, N.A. (“BANA”), by and through its counsel, Law Offices of  
20 Amy N. Tirre, APC, respectfully requests the Court to enter an order extending the time allowed for  
21 BANA to file its response to the Complaint up to and including October 14, 2014. In support  
22 thereof, BANA states as grounds:  
23  
24 1. Plaintiff, FLORAME DELOS REYES LU DO, filed the Complaint on August 21,  
25 2014.  
26 2. BANA was served with the Complaint on September 10, 2014.  
27 3. Undersigned counsel was retained by BANA on or about September 30, 2014.  
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1           4. In order to evaluate the factual allegations stated in the Complaint, research its  
2 records, and determine the circumstances involved, BANA requires additional time to file its  
3 response.

4           5. BANA's counsel contacted counsel for Plaintiffs on September 30, 2014, to request  
5 an extension of time until October 14, 2014 for BANA to file its response to the Complaint. Counsel  
6 for Plaintiff agreed to the relief sought herein.

7           6. The foregoing Motion is filed in good faith and not for dilatory or other improper  
8 purposes. No other request for extension of time has been filed.

10           WHEREFORE, BANK OF AMERICA, N.A., respectfully requests this Court to enter an  
11 Order granting an extension up until October 14, 2014 for BANA to file its response to the  
12 Complaint.

14           DATED: October 7, 2014.

15           LAW OFFICES OF AMY N. TIRRE,  
16           A Professional Corporation

17           \_\_\_\_\_  
18           /s/ Amy N. Tirre  
19           Amy N. Tirre, Esq.

20           IT IS SO ORDERED.

21             
22           \_\_\_\_\_  
23           UNITED STATES DISTRICT ~~JUDGE~~  
24           Magistrate  
25           DATED: October 9, 2014

## **CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of Law Offices of Amy N. Tirre, APC, that I am over the age of 18 and not a party to the above-referenced case, and that on October 7, 2014, I filed and served the foregoing document as indicated:

X   **BY NOTICE OF ELECTRONIC FILING:** through Electronic Case Filing System of the United States District Court, District of Nevada, to the individuals and/or entities at their email addresses as set forth below:

Keen L. Ellsworth, Esq.  
[keen@silverstatelaw.com](mailto:keen@silverstatelaw.com)

Kent F. Larsen, Esq.  
[kfl@slwlaw.com](mailto:kfl@slwlaw.com)

**BY HAND DELIVERY VIA COURIER:** by causing hand delivery of the Document listed above via courier service to the persons at the addresses set forth below.

**BY MAIL:** by placing the document listed above in a sealed envelope with Postage thereon fully prepaid in the United States Mail at Reno, Nevada, and addressed as set forth below. I am readily familiar with my office's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on 7 October 2014, with postage thereon fully prepaid in the ordinary course of business.

DATED: October 7, 2014.

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/s/ Genevieve DeLucchi  
An Employee of Law Offices of Amy N. Tirre, APC